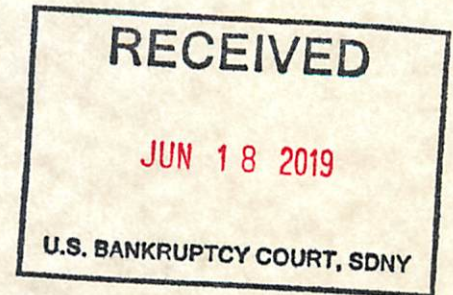


Elizabeth Harrison
1413 N. Vermont Street
Arlington, Va. 22201
Telephone: 571-480-2520
Email: eharrison165@gmail.com
Pro Se



UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

Elizabeth Harrison)	Case No.: 08-13555 (SCC)
)	
)	
vs)	(Jointly Administered)
)	
)	
Lehman Brothers Holdings Inc., et al,)	
)	
)	
Debtors)	

**OBJECTION TO THE MOTION OF PLAN ADMINISTRATOR FOR AN ORDER IN
AID OF EXECUTION OF THE MODIFIED THIRD AMENDED CHAPTER 11 PLAN
OF LEHMAN BROTHERS HOLDINGS INC. AND ITS AFFILIATED DEBTORS**

**OBJECTION TO PROPOSED ORDER IN AID OF EXECUTION OF THE MODIFIED
THIRD AMENDED CHAPTER 11 PLAN OF LEHMAN BROTHERS HOLDINGS
INC. AND ITS AFFILIATED DEBTORS**

**TO THE HONORABLE SHELLEY C CHAPMAN
UNITED STATES BANKRUPTCY JUDGE**

Elizabeth Harrison, as pro se, files this objection to "NOTICE OF PRESENTMENT OF
MOTION OF PLAN ADMINISTRATOR FOR AN ORDER IN AID OF EXECUTION OF THE
MODIFIED THIRD AMENDED JOINT CHAPTER 11 PLAN OF LEHMAN BROTHERS
HOLDINGS INC. AND ITS AFFILIATED DEBTORS," and the "PROPOSED ORDER IN AID

OF EXECUTION OF THE MODIFIED THIRD AMENDED CHAPTER 11 PLAN OF
LEHMAN BROTHERS HOLDINGS INC. AND ITS AFFILIATED DEBTORS” filed by the
Plan Administrator (Docket # 59756) and respectfully states:

1. The Debtor is pursuing an early distribution because the debtor wants to avoid paying the LBHI Capital Trust 3, 4, 5 and 6 preferred share holders once the "floodgates" are opened. The debtor used "floodgates" in his objection to motion docket # 59614. Rex Wu states correctly that doing the right thing and getting the largest bankruptcy in US history correct is with utmost importance. The Debtor should enforce the Plan of Reorganization and not go around it. The Debtor wants to avoid their responsibility to pay the 4 Capital Trust shareholders by setting the Record Date to June 17th, two days before the Hearing for Docket #59614.
2. The LBHI Capital Trust shareholders should be given the chance to contact their trustee to enforce the Guarantee globally.
3. The Plan Administrator requests authority to establish July 18, 2019, as a distribution date to distribute available cash to debtors' creditors, and to establish June 17, 2019 as a Record Date for such distribution. The Record Date is 2 days before the Hearing Date for "Motion for an Order Enforcing the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors for Purposes of Distributions" (Docket # 59614), filed by Rex Wu and joined by Elizabeth Harrison (Docket # 59755).
4. A hearing is scheduled on Rex Wu's motion (Docket # 59614) joined by Elizabeth Harrison (Docket # 59755) on June 19, 2019. The June 17, 2019 Record Date has an

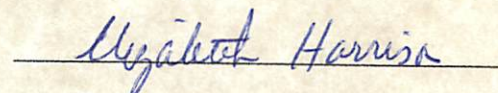
adverse and detrimental effect in regards to the timing of Rex Wu's motion. The Record Date of June 17, 2019 will result in Elizabeth Harrison missing the early distribution should the ruling on motion docket # 59614 be ruled in her and Rex Wu's favor.

5. Plan administrator presents no valid and compelling reason to advance the date of the distribution. Plan administrator offers a vague claim of additional available cash.
6. Therefore the motion and order proposed by Plan Administrator should be rejected by the court.

Wherefore, Elizabeth Harrison respectfully requests the Honorable Court to grant her objections and deny the "MOTION OF PLAN ADMINISTRATOR FOR AN ORDER IN AID OF EXECUTION OF THE MODIFIED THIRD AMENDED JOINT CHAPTER 11 PLAN OF LEHMAN BROTHERS HOLDINGS INC. AND ITS AFFILIATED DEBTORS," and the "PROPOSED ORDER IN AID OF EXECUTION OF THE MODIFIED THIRD AMENDED CHAPTER 11 PLAN OF LEHMAN BROTHERS HOLDINGS INC. AND ITS AFFILIATED DEBTORS" filed by the Plan Administrator.

Respectfully Submitted

Dated this 15th day of June, 2019

A handwritten signature in blue ink, reading "Elizabeth Harrison", is written over a horizontal line.

Elizabeth Harrison
1413 N. Vermont Street
Arlington, Va. 22201
Pro Se